



**XTO East Foreland AKG 315003**

**Richard Cool** to: Alfred Vann

Cc: Cindi Godsey

03/05/2012 03:11 PM



**AKG315000-FP.pdf**

**CINDI:** Feel free to comment if you see anything I misstate. For context, I am reviewing the compliance status of three XTO facilities starting with East Foreland and Al is helping me understand how to review ICIS data base entries. I am making some comparisons to what I see in ECHO and trying to reconcile and understand what I see there and what is in the files.

**AL:** Thank you again for your guidance and help. Before I set this particular XTO file aside, I was bugged by my oversight failure to find that reporting violation that shows up in AKG315003 for April 2008 so I went back to look per your help. No need to make changes now if you concur - as we discussed

In sum, I think that ICIS entry might not be accurate for AKG315003 and here is my rational. Per my note to Cindi above, I am hoping she will confirm my GP assessment or jump me for misstating GP reqts..

As background, East Foreland AKG315003 is only authorized for Discharge 015, Produced Water. The ICIS data entry indicated a schedule date violation for 4/1/2008 and had the text "Chemical Biocide Inventory II.F.2.a."

First, the GP, Part II.F.2.a., is only applicable to Discharge 005, Desalination Unit waste discharge.

Second,. the GP does not have an annual Chemical Inventory submittal requirement for Discharge 015, Produced Water. The only April 1 chemical inventory submittal requirements that I could find relate to Discharges 005 (desal) and Discharges 016-019 (see Part II.H.3.). Part II.F.1., Table 5, requires a Monthly chemical additive determination(s) to meet the limits in Part II.F.3. but only for Discharges 005-014. However, Part II.F.3. is only a "calculated" compliance determination, not an actual sampled and analyzed chemical concentration determination.

[As a side note, I could not locate any annual submission requirements related to these Part II.F.3. compliance calculation determinations. I suspect that our prior GP permit writer would assert that the operator must retain records of these compliance calculations under the generic Parts IV.E. and IV.F., records contents/retention provisions, available to EPA upon request.]

In addition, I have not pulled the XTO AKG315012/5013 files but if I am operating my ICIS "read" Limit Sets correctly, those two permits might have authorized Discharge 005 Desal and thus a chemical inventory would be due by April 1 for those two permits.

That's it. I look forward to picking up these XTO files when we prioritize them per our morning discussion. Let me know if you have any questions or if you see it differently. Again, thank you for your patience and for taking time to field all of my ICIS questions, much appreciated!

Rick